

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SONNY JOYCE, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

AMAZON.COM, INC., ANDREW R. JASSY,
JEFFREY P. BEZOS, BRIAN T.
OLSAVSKY, DAVID A. ZAPOLSKY, and
NATE SUTTON,

Defendants,

Case No.: 2:22-cv-00617-JHC

NOTICE OF RELATED CASES

PLEASE TAKE NOTICE THAT, pursuant to Local Civil Rule 3(g), Defendants Amazon.com, Inc., Andrew R. Jassy, Jeffrey P. Bezos, Brian T. Olsavsky, David A. Zapolsky, and Nate Sutton hereby give notice that the following actions are related to this action.

Case Name	Case Number and Location	Judge	Date Filed
<i>Asbestos Workers Philadelphia Welfare and Pension Fund v. Amazon.com, Inc., et al.</i>	Case No. 2:22-cv-00934-JCC (W.D. Wash.)	Hon. John C. Coughenour	July 6, 2022
<i>Detectives Endowment Association Annuity Fund v. Amazon.com, Inc., et al.</i>	Case No. 2:22-cv-00950-JRC (W.D. Wash.)	Hon. J. Richard Creatura	July 8, 2022

Asbestos Workers and *Detectives* are related to this case because the three cases “concern substantially the same parties, property, transaction, or event.” LCR 3(g)(4)(A). All three cases are putative class actions asserting securities fraud claims under Section 10(b) of the Exchange Act against common defendants Amazon.com, Jassy, and Olsavsky, and under Section 20(a) of the Exchange Act against common defendants Jassy and Olsavsky.

In addition, the class periods of these cases substantially overlap. Almost the entirety of the class period alleged in *Asbestos Workers* and *Detectives*—July 30, 2021 to April 28, 2022—falls within the period alleged in *Joyce*: February 1, 2019, to April 5, 2022. As a result, the putative class members in this case substantially overlap with the putative class members in *Asbestos Workers* and *Detectives*. The substantial overlap in class periods, plaintiffs, and defendants, as well as anticipated factual disputes about the causes of any alleged inflation in Amazon’s stock price during the relevant time periods, further support that these cases are related. See LCR 3(g)(4)(B) (duplication of labor and expense and potential for conflicting results are reasons to relate cases).

While the complaints set forth different theories of alleged fraud—here, concerning Amazon’s alleged use of third-party seller data, and in *Asbestos Workers* and *Detectives*, concerning Amazon’s fulfillment capacity—the three complaints rely on at least one common event: alleged misstatements on Amazon’s 4th quarter 2021 earnings call. In particular, all of

these cases allege that defendants' public statements on that call artificially inflated Amazon's stock price, damaging Amazon shareholders. *Joyce* Compl. ¶ 54; *Asbestos Workers* Compl. ¶¶ 32–34; *Detectives* Compl. ¶¶ 36–38.

Finally, Plaintiffs' counsel in *Detectives* appear to agree that the cases are related. Those same counsel recently filed in this District (and then voluntarily dismissed) a lawsuit captioned *CWA Local 1180 Members' Annuity Fund v. Amazon.com, Inc.*, No. 2:22-cv-00907. That suit brought securities fraud claims related to both Amazon's alleged use of third-party seller data and Amazon's fulfillment capacity. In other words, the *CWA Local/Detectives* counsel brought claims based on the same fraud theories alleged in *Joyce*, *Asbestos Workers*, and *Detectives* and based on the same alleged misstatements that remain at issue in the three pending lawsuits.

Dated: July 11, 2022

Respectfully submitted,

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